

DRAFT

Issue: Centralized records storage for the Department.

EM Records Management (RM) Committee: The Rocky Flats (RF), Ashtabula, Columbus, Fernald and Mound sites are targeted to close during this decade. RF is a self-managed DOE facility. The other sites are part of a parent Ohio Field Office (OH) which will cease operation once its constituent elements complete their environmental cleanup activities. RF expects to dispose of over 160,000 cubic feet of records; OH about 94,000 cubic feet. A portion of these records will need to be maintained by an organization responsible for long-term surveillance and maintenance of the closed sites. The bulk of the records will be archived for different lengths of time but will be retrieved, as required, for research and other needs. RF personnel requested that the Headquarters Office of Environmental Management (EM) help them identify a Field organization that would assume responsibility for their records. RF planned to work with the designated site to identify appropriate long-term archival facilities for the records.

The EM program manager determined that the need for succession existed at both the RF and OH sites. A group of interested participants (the EM RM Committee) was formed to address records storage and related issues. One of the principal related issues to emerge was whether the Department should construct and manage its own facilities for inactive records storage.

Background: In FY 1995, the Department estimated a total volume of 3 million cubic feet of records. At that time, the Headquarters Records Management Division which was under the Office of Management and Administration (now under the Office of Security and Emergency Operations) lead an effort to investigate the feasibility of centralized records storage. The arguments recommending a DOE facility included:

- Better intellectual and physical control over the Department's records;
- A consolidated database that could be accessed from anywhere in the Department;
- Improved accessibility for FOIA and legal discovery;
- Convenience for researchers;
- Storage that meets established standards;
- Classified and non-classified records stored at the same location;
- Records collections would not be split due to limited storage capacities; and
- Potential cost savings on storage/retrieval (vs. commercial storage at most sites).

These arguments are still valid.

The proposal was not successful due to indications that a number of DOE laboratories would not participate. The reasons for their lack of enthusiasm included cost, apparent accessibility and control. At the time, Federal Records Centers (FRCs) received funding from Congressional appropriations and no expense was incurred by using them. A DOE records facility would have had to charge users for storage and retrieval to recover operating costs. Laboratory officials also expressed concerns that the storage facilities might not be close to their location, a situation that may have resulted in delayed retrieval and delivery of documents. The laboratories stored most of

their inactive records on-site (although not necessarily in facilities that met established standards). They perceived use of a centralized storage site as potentially losing control of the records.

Discussion: In 1999, FRCs began charging agencies for storing and retrieving documents. (Current charges are approximately \$3.30 per cubic foot). Other agencies, such as the Veterans Administration, have opened their NARA-approved storage facilities for use by other agencies, charging competitive rates. Opposition to centralized storage on the basis of cost is now a non-issue, assuming DOE's facilities would be cost competitive. As for retrieval of stored documents, there is ample evidence that the overnight shipping services have become most efficient at speedy delivery. The biggest time factor would be in precise identification of the record(s) being sought, which is a database issue.

RF will produce an estimated 67,500 cubic feet of records concerning its shipments of waste to the Waste Isolation Pilot Project (WIPP) in Carlsbad, New Mexico. The current policy is that generating sites maintain these records in an active state. However, RF will cease to exist upon completion of its environmental restoration work. The records must be shipped to either another DOE Operations Office or to the Carlsbad Field Office for management. The EM RM Committee has tentatively agreed that the best solution is for RF records to be shipped to Carlsbad, if that option proves economically feasible.

The Environmental Protection Agency has lauded Carlsbad's current records management system as a 'jewel in the crown' for environmental record keeping at DOE, and would likely be supportive of a storage facility at that site. Additionally, the State of New Mexico would like all the WIPP records close to the waste site. Carlsbad does not currently have sufficient records storage capacity and would need to build a new facility. Although Carlsbad is on the fringe of "tornado alley," the repository could be protectively built into the side of "C Hill," rendering it immune from the elements. If Carlsbad were to build a storage facility, it could contain the RF and WIPP records, and perhaps inactive records from other DOE sites.

The General Services Administration (GSA) will build a facility and lease it back. However, eventually the Department would have to assume ownership of the building. DOE will be required to complete 35% of the design work before GSA will commit to the project. The size (and cost) of the facility will depend upon whether it is intended for Department-wide or EM use.

Conclusions: The EM RM Committee has concluded that:

- (1) Central storage is required for EM records.
- (2) Carlsbad is potentially the best location for RF and WIPP records, however, additional space will be required for Ohio closure sites. (The Oak Ridge (OR) Operations Office has tentatively agreed to accept records from the Ohio sites.)
- (3) Two storage facilities (Carlsbad for the western side of the Mississippi and OR for the eastern) will be needed to fulfill EM requirements.
- (4) Efforts to establish and/or expand storage facilities at these locations would be best undertaken on a Department-wide basis.
- (5) Support for central storage facilities for the Department must be sought from the Records

Management and Field Management Councils.

Recommendations: The EM RM Committee recommends that:

- (1) Interest in centralized records storage for the Department be solicited first from members of the RM Council;
- (2) If interest from the RM Council warrants, a proposal to revive the feasibility study on centralized storage be taken to the Field Management Council; and
- (3) The Carlsbad and Oak Ridge sites (for reasons outlined in the Conclusions section) receive first consideration.

Notwithstanding support from the RM Council, the EM RM Committee recommends that:

- (4) The Rocky Flats and WIPP waste records be stored in a facility managed by the Carlsbad Field Office;
- (5) Management responsibility for inactive records from the OH closure sites be assigned to the Oak Ridge Operations Office.